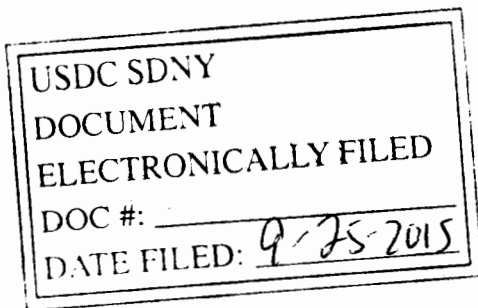


**PRYOR CASHMAN LLP**

New York | Los Angeles

7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

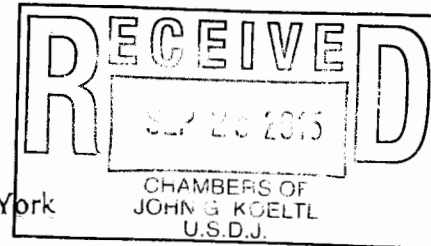
www.pryorcashman.com

**MEMO ENDORSED**Lisa M. Buckley
PartnerDirect Tel: 212-326-0483
Direct Fax: 212-798-6377
lbuckley@pryorcashman.com

September 25, 2015

VIA FIRST CLASS MAIL

Hon. John G. Koeltl
United States District Judge for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. - #1030
New York, NY 10007-1312

Re: Cooksey v. Global Grind, 1:14-cv-07146-JGK

Dear Judge Koeltl:

I am a partner in the law firm Pryor Cashman LLP and I write to respectfully request that the Court seal a personally disparaging and facially baseless "Amended Complaint" filed by *pro se* plaintiff, Calvin Cooksey. I note that Mr. Cooksey's initial complaint was dismissed *sua sponte* by Judge Preska for lack of federal subject matter jurisdiction and while my client does not hereby acquiesce to this Court's exercise of jurisdiction over the new pleading, I believe Your Honor will understand the necessity of this submission and the relief it seeks. (Your Honor's individual rules do not permit me to attach a copy of the ostensible Amended Complaint because it exceeds 15 pages).

Our client, defendant Global Grind is a website primarily devoted to celebrity news. Mr. Cooksey is the father of Frank Ocean, a well-known and highly successful recording artist and performer. In the Amended Complaint, Mr. Cooksey alleges that Global Grind defamed and/or libeled him by publishing an article in December 2012 referring to him as a *dead beat dad*. Beginning in June of this year, Mr. Cooksey began corresponding with me and he has attached some of that correspondence to his Amended Complaint. Among other things, Mr. Cooksey accused our client Global Grind of destroying evidence by reason of Global Grind's removal of the subject article from its website upon his objection to its contents. (A screen shot of the article was preserved and is attached to this letter for the Court's convenience).

Mr. Cooksey wrote me that my client had committed a felony by taking down the article from its website and that I personally committed a felony by failing to report my client for its alleged misconduct, and by purportedly instructing Global Grind to "destroy evidence." Mr. Cooksey's harassment persisted notwithstanding my telling him repeatedly that no evidence had

Mr. Cooksey

on 9-25-2015



Hon. John G. Koeltl
United States District Judge for the Southern District of New York
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been destroyed and that what had appeared on Global Grind's website had been preserved. Among his harassing actions, Mr. Cooksey said he was making a complaint to the American Bar Association, the FBI and the CIA, and that he intended to sue me and my firm because I committed *felony crimes*. Now, in his Amended Complaint filed yesterday, he claims he is entitled to punitive damages based on his allegations that my client and I committed felonies crimes by destroying evidence that, in fact, was not destroyed, and reiterating his intent to sue me and my firm.

While the Court will see from the correspondence Mr. Cooksey attached to his purported Amended Complaint, which is an incomplete record of our correspondence, that his accusations are demonstrably false, anyone who searches my name on the internet, including current and potential clients, and adversaries and colleagues, will inevitably view these false accusations of criminal conduct. No attorney could get away with such actions and the fact that Mr. Cooksey is acting *pro se* is no excuse for his unconscionable behavior.

Accordingly, we respectfully request that the Court immediately seal Mr. Cooksey's Amended Complaint at least on an interim basis, after which we will make any formal motions required by the Court. I suspect that a sealing order may be necessary for additional filings by Mr. Cooksey.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lisa M. Buckley'.

Lisa M. Buckley

Enclosure

cc: Calvin Cooksey

The Clerk of Court is directed
to seal the Amended Complaint
pending further order of the
Court.

SO ORDERED:

A handwritten signature in black ink, appearing to read 'Laura Taylor Swain'.

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE